

STATE OF INDIANA	)	IN THE TIPPECANOE CIRCUIT COURT
	)	SS:
COUNTY OF TIPPECANOE	)	CAUSE NO. 79C01-2010-PL-_____
DAVID GOODRICH,	)	
	)	
PLAINTIFF,	)	
	)	
V.	)	
	)	
QUEEST GLOBAL SERVICES-NA,	)	
INC.,	)	
	)	
DEFENDANT.	)	

### COMPLAINT AND DEMAND FOR JURY TRIAL

Plaintiff David Goodrich brings this action against QuEST Global Services-NA, Inc. for violation of the Age Discrimination in Employment Act, 29 U.S.C. §621 *et seq.* ("ADEA"). Goodrich is a 57 year old male that QuEST terminated because of his age.

### PARTIES

1. Goodrich is an individual who resides in Tippecanoe County, Indiana.
2. Goodrich worked for QuEST as an employee until August 5, 2019.
3. QuEST is an Ohio corporation doing business in Indiana.
4. Until his termination on August 5, 2019, QuEST was Goodrich's employer.

### JURISDICTION AND VENUE

5. This case involves a question of federal law over which state courts have concurrent jurisdiction.
6. This Court is a proper venue for this matter because the Defendant may be found in this judicial district and because the facts giving rise to this case occurred in substantial part in this judicial district.



### **FACTS**

7. Goodrich is over the age of 40.
8. Goodrich is part of the class of individuals protected by the ADEA.
9. On August 5, 2019, QuEST terminated Goodrich.
10. Goodrich's termination was without cause.
11. At the time of his termination, Goodrich was meeting all of QuEST's legitimate job expectations.
12. Prior to his termination, Goodrich had received favorable performance marks on his most recent performance review.
13. Prior to his termination, QuEST had paid bonuses, incentives, and salary increases to Goodrich because of his work performance.
14. QuEST told Goodrich that his separation was because of "organizational changes."
15. QuEST did not make bona fide organizational changes to the Lafayette office at or around the time of Goodrich's termination.
16. Instead, the only "organizational change" made to the Lafayette office was to remove Goodrich from it.
17. QuEST replaced Goodrich with a substantially younger employee.
18. Specifically, QuEST replaced Goodrich with the then-29 year old Andrew Paul.

### **COUNT I – VIOLATION OF THE ADEA**

19. QuEST discriminated against Goodrich because of his age, in violation of the ADEA.

20. Goodrich has been harmed by QuEST's unlawful conduct.

**PRAYER FOR RELIEF**

WHEREFORE Plaintiff David Goodrich demands judgment against QuEST for:

- a) Reinstatement to his position;
- b) His lost wages;
- c) The value of his lost benefits and perquisites of employment;
- d) Liquidated damages;
- e) His attorney's fees;
- f) The costs of this action;
- g) All other relief this Court determines to be necessary and proper.

/s/ Jason R. Ramsland  
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**DEMAND FOR JURY TRIAL**

Plaintiff demands trial by jury on all issues so triable.

/s/ Jason R. Ramsland  
Jason R. Ramsland (#29443-29)